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10/4/18

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE:	)	
	)	CASE NO. 12-18298
	)	
BARBARA L. GROMEK	)	JUDGE ARTHUR I. HARRIS
JOSEPH A. GROMEK	)	
	)	
Debtors	)	CHAPTER 11
	)	
	)	<b>MOTION TO REOPEN CASE</b>

Now comes the Debtors, and move the Court for an Order Reopening their Chapter 11 case. As grounds for the Motion, Debtors state that they wish to file a Motion to Show Cause against BSI Financial Services (“BSI”) for violating the Discharge Injunction. The reason for the Motion to Show Cause is that despite this Court’s Confirmation Order, BSI is attempting to collect from Debtors by threatening them with Notices of Default and Intent to Accelerate. Debtors believe that this action violates the confirmed plan and Discharge Injunction under Section 524 of the Bankruptcy Code.

Respectfully submitted:

/s/Glenn E. Forbes  
Glenn E. Forbes, Esq., #0005513  
Attorney for Debtor  
FORBES LAW LLC  
166 Main Street  
Painesville, OH 44077  
(440) 357-6211 ext. 128  
Email: gforbes@geflaw.net  
bankruptcy@geflaw.net

**CERTIFICATE OF SERVICE**

I hereby certify that on October 11, 2018, a true and correct copy of the Motion to Reopen Case was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

United State Trustee at (registered user)@usdoj.gov

Stacey A. O'Stafy, [sao@manleydeas.com](mailto:sao@manleydeas.com)

Christopher P. Kennedy, [ckennedy@carlisle-law.com](mailto:ckennedy@carlisle-law.com)

Michelle R. Ghidotti-Gonsalves, [mghidotti@ghidottilaw.com](mailto:mghidotti@ghidottilaw.com)

And by regular US Mail, postage prepaid to:

BSI Financial Services  
314 S. Franklin Street  
Titusville PA 16354

BSI Financial Services  
1425 Greenway Drive, Ste 400  
Irving, TX 75038

/s/Glenn E. Forbes  
Glenn E. Forbes, Esq. (0005513)